

\*e filed 4/3/07

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Attorneys for Defendant,  
Hung Manh Nguyen

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ELIZABETH DEL CARMEN PEZOA

Plaintiffs,

v.

COUNTY OF SANTA CLARA, a public  
entity, HUNG MAHN NGUYEN aka  
SUNG NGUYEN and DOES 1- 25,  
inclusive,

Defendants.

NO. C-05-3717 JF

**STIPULATED REQUEST FOR ORDER  
CONTINUING TRIAL DATE**

Plaintiff Elizabeth Del Carmen Pezoa, through her attorney of record, Marguerite M. Buckley, Defendants County of Santa Clara and Bruce Lynn Copely, through their attorneys of record Cheryl Stevens, Deputy County Counsel and Defendant Hung Manh Nguyen, through his attorney of record Mark B. Fredkin and Linda M. MacLeod of Morgan, Franich, Fredkin & Marsh, after meeting and conferring on the matters herein, do hereby stipulate as follows:

1. Trial in this matter is presently set for June 22, 2007. Individual Defendant Hung Manh Nguyen was not served with the Summons and First Amended Complaint until September, 2006 and due to some questions about the pleadings, the parties stipulated to

1 dismiss the first two claims against Nguyen, and to allow County additional time to answer.  
2 Nguyen's Answer was filed on February 15, 2007 and County's answer was filed on February  
3 20, 2007. The parties have begun discovery, but depositions have not begun and the parties  
4 agree that this matter will not be ready for trial on June 22, 2007.

5 2. All parties agree to continue the trial date to December 3, 2007. The trial is  
6 estimated by Plaintiff to last for ten days.

7 3. All parties agree that all discovery due dates and dates noted in the case  
8 management order shall be changed per the Federal Rules, in accordance with the December  
9 3, 2007 trial date.

10 4. This Stipulation is executed in three parts, faxed to the parties and may be e-filed  
11 with the Court upon receipt of the executed faxes. The parties will mail the originals to  
12 attorney Mark B. Fredkin who will retain said originals in his files.

13 SO STIPULATED:

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15 March 28, 2007

  
MARGUERITE M. BUCKLEY,  
Attorney for Plaintiff Elizabeth Del Carmen Pezoa

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18 March \_\_, 2007

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CHERYL STEVENS, County Counsel,  
Attorneys for Defendants County of Santa Clara  
and Bruce Lynn Copely

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21 March \_\_, 2007

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MARK B. FREDKIN,  
Attorneys for Defendant Hung Manh Nguyen

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23  
24 **ORDER**

25 PURSUANT TO STIPULATION, IT IS SO ORDERED.

26  
27 March 30, 2007

  
\_\_\_\_\_  
JUDGE OF THE DISTRICT COURT

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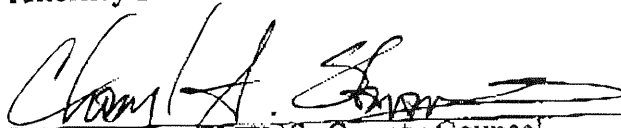
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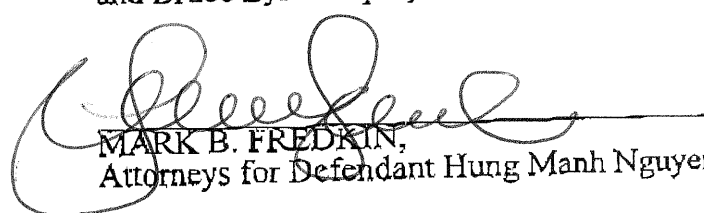
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15 March \_\_, 2007

MARGUERITE M. BUCKLEY,  
Attorney for Plaintiff Elizabeth Del Carmen Pezoa

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17  
18 March 27, 2007

  
CHERYL STEVENS, County Counsel,  
Attorneys for Defendants County of Santa Clara  
and Bruce Lynn Copely

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20  
21 March 29, 2007

  
MARK B. FREDKIN,  
Attorneys for Defendant Hung Manh Nguyen

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23  
24 ORDER

25 PURSUANT TO STIPULATION, IT IS SO ORDERED.

26  
27 March \_\_, 2007

JUDGE OF THE DISTRICT COURT